

U.S. EPA Region III RCRA Programs Branch Pennsylvania Section ( 3 HW51 ) 841 Chestnut Building Philadelphia, Pa. 19107

February 23, 1994

RECEIVED PA/DC SECTION

MAR 2 1994

Dear Sir/Madam

EPA REGION III

Enclosed please find an updated EPA Form 8700-12 (Notification of Regulated Waste Activity ) for Aristech Chemical Corporation,s Neville Island Facility.

Should you have any questions concerning information provided, I can be reached at (412) 778-3308.

Sincerely,

Eugene F Turoupy

Eugene F. Turoczy Environmental & Industrial Hygiene Technician

enclosures cc: PA DER

Southwest Regional Office

400 Waterfront Drive

Pittsburgh, Pa. 15222-4745

File



For Approved OME No. 2050-0024 . expires 6-31-93

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

**&EPA** 

## Notification of Regulated Waste Activity

nited States Environmental Protection Agency

PA/Date Received
(For Official Use Only)

MAR 2 1994

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		ID - For Official Use Only
VIII. Type of Regulated Waste Activity	y (Mark X' in the appropriate boxes. Refer to	Instructions.)
A. Hazardou	s Waste Activity	B. Used Oil Fuel Activities
1. Generator (See Instructions)  A. Greater than 1000kg/mo (2,200 lb.)  b. 100 to 1000 kg/mo (220 - 2,200 lb.)  c. Less than 100 kg/mo (220 lbs.)  2. Transporter (Indicate Mode in boxes  a. For own waste only  b. For commercial purposes  Mode of Transportation  1. Air  2. Rail  3. Highway  4. Water  5. Other - specify	be.) 4. Hazardous Waste Fuel  a. Generator Marketing to Burner	1. Off-Specification Used Oil Fuel  a. Generator Marketing to Burner  b. Other Marketing to Burner  c. Burner - Indicate device(a) -  Type of Combustion Device  1. Utility Boller  2. Industrial Boller  3. Industrial Furnace  2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification
L		
IX. Description of Regulated Wastes (	Use additional sheets if necessary)  s Wastes. Mark 'X' in the boxes corresponding to the	characteristics of populated becardous
wastes your installation handles. (See 40		Characteristics of normsted hazardods
1. Ignitable 2. Corroeive 3. Reactive	Characteristic	
	X D 0 0 6 D 0 0	7 D O O 8 D O O 9
	R 261.31 - 33. See instructions if you need to list more	
I     Z       F 0 0 1     F 0 0 2       7     8       U 0 6 9     U 1 4 7	3 4 F 0 0 3 F 0 0 5 U 1 9 0	5 U 0 2 8 U 0 3 1 12 12
C. Other Wastes. (State or other wastes rec	quiring a handler to have an I.D. number. See instruct	ions.)
1     2       P A O 1     D O 1 9	3 4	5 8
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accordance with a system designed submitted. Based on my inquiry of the gathering the information, the inform complete. I am aware that there are sig imprisonment for knowing violations.	document and all attachments were prepared to assure that qualified personnel properly person or persons who manage the system, or lation submitted is, to the best of my knowle nificant penalties for submitting false information.	gather and evaluate the information those persons directly responsible for edge and belief, true, accurate, and on, including the possibility of fine and
Signature Mufunt	Name and Official Title (type or print) STANLEY J. KERKENTZES/PLANT MANA	Date Signed  GER 2-23-54
(). Comments	A	
		BOH del 9/9/94
Note: Mail completed form to the appropri	ate EPA Regional or State Office. (See Section III o	

# Pennsylvania Department of Environmental Resources Bureau of Waste Management

## SUPPLEMENT TO U.S. EPA NOTIFICATION OF HAZARDOUS WASTE ACTIVITY FORM (EPA Form 8700-12)

lame of InstallationARISTECH_CHEMICAL_C	
ocation of Installation	" ALLEGHENY
PITTSBURGH, PA 15225  Municipality (Township, Borough, Cit	
RS Employer Identification Number	<b>-</b> 1 5 3 4 4 9 8
IC Codes (four-digit number in order of priority)	
Specify: PLASTICIZERS + MALEIC ANHYDRII	DE 2 8 2 1 Specify: POLYESTER RESINS
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ype of Hazardous Waste Activity	
3. Disposer 4. Reuse, Recycle, Reclaim 5. Permit by Rule	
3. Disposer 4. Reuse, Recycle, Reclaim 5. Permit by Rule  xisting Environmental Permits  A. NPOES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
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3. Disposer 4. Reuse, Recycle, Reclaim 5. Permit by Rule  sisting Environmental Permits  A. NPOES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)  E. Municipal Waste (As defined in Act 97)
3. Disposer 4. Reuse, Recycle, Reclaim 5. Permit by Rule  (isting Environmental Permits  A. NPOES (Discharges to Surface Water)  PAOOO38832  B. UIC (Underground injection of fluids)	E. Municipal Waste (As defined in Act 97)
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# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

400 Waterfront Drive Pittsburgh, PA 15222-4745 February 8, 1994

(412) 442-4000

Southwest Regional Office

#### NOTICE OF VIOLATION

CERTIFIED MAIL #P 280 445 387

Steve Stockton Aristech Chemical Corp Neville Island Plant 200 Neville Road Neville Island, PA 15225-1696

> RE: Non-Compliance Hazardous Waste Activity Aristech Chemical Corp PAD000824730 Neville Township Allegheny County

Dear Mr. Stockton:

As a result of an inspection conducted by the Department on 1/25/94 at Aristech Chemical Corp, ("Aristech"), located at 200 Neville Road, Neville Township, Allegheny County, it has been determined that Aristech is in violation of the Solid Waste Management Act of the Commonwealth of Pennsylvania ("SWMA"), Act of July 7, 1980, P.L. 380, as amended, P.S. §6018.101 et seq., and the Rules and Regulations promulgated thereunder as follows:

- A. Aristech failed to obtain a permit prior to treating a hazardous waste. Specifically, acidic wastewater (ph <2) from the maleic anhydride process was being neutralized in the two residue tanks. This constitutes a violation of the Solid Waste Management Act, Section 401(a) and Section 270.1(a) of the Department's hazardous waste regulations.
- C. The activities and conditions described in Paragraph A above, constitute unlawful conduct pursuant to Sections 610(2)(4) and (9) of the SWMA; constitute a public nuisance pursuant to Section 601 of the SWMA; and subject the offender to civil penalty liability pursuant to Section 605 of the SWMA.

In order to achieve compliance with the SWMA, the implementation of the following is recommended:

- 1. Immediately cease treating hazardous waste in the maleic residue tanks.
- 2. Make the necessary modifications to the process lines to eliminate said treatment OR begin shipping and disposing of the wastewater as hazardous waste.
- 3. If Aristech chooses to manage the wastewater as hazardous waste, tanks should comply with Chapter 265, Subchapter J requirements.
- 4. By February 28, 1994, submit to the Department a written report addressing the circumstances under which these violations occurred, and the provisions you have taken to prevent their recurrence.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

Also, this letter shall not be construed as a final action of the Department of Environmental Resources

If you have any questions concerning this matter, pleaae contact this office.

Sincerely,

Shawn Staley

Solid Waste Specialist

Waste Management

cc: EPA

bc: Regional

Chron

Central

K. Watson

S. Staley -

SS:njh

Avistech Chemical Corporation Newselsiand Plant Pittsburgh, PA 15225

## **ARISTECHAIII**

# RECEIVED February 18, 1994

FEB 2 2 1994

DER, Southwest Region Commonwealth of Pennsylvania Department of Environmental Resourcesseau of Waste Management 400 Waterfront Drive Pittsburgh, PA 15222-4745 Attn: Mr. Shawn Staley

> RE:Aristech Chemical Corp PAD000823730 Neville Township Allegheny County

Dear Mr. Staley:

This is in response to your Notice of Violation dated February 8, 1994. Aristech Chemical Corporation denies that its Neville Island Plant has engaged in the treatment of hazardous waste in violation of the Solid Waste Management Act as indicated in the Notice of Violation. This process is long standing and was reviewed by the Department in 1986. The process has not changed since that time. As you can see from the attached inspection report from the Department, we asked if we needed a permit for such an addition. The Department's evaluation concluded that "No treatment permit for this process is required under the present regulations."

Nevertheless, in response to the issues you raised during the inspection on January 25, 1994 regarding the addition of the caustic, and to avoid further controversy, we immediately ceased the addition of caustic at the point noted during your inspection. We have modified our process to safely add the caustic to the residue in the line prior to the residue tanks to continue to prevent solids from precipitating out of solution. It is essential to our process that the pH be adjusted in the process to prevent such precipitation of solids which would plug the lines and pumps. This modification will enhance our ability to keep the system from plugging. The residue tanks will contain residual waste and will be managed accordingly.

If you have any questions concerning our response to your inspection report, please contact me at (412) 778-3354.

Sincerely,

Steven D. Stockton

Manager-Environmental & Safety





# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

BUREAU OF WASTE MANAGEMENT
Highland Building
121 South Highland Avenue
Pittsburgh, Pennsylvania 15206-3988
(412) 665-2900 (answers 24 hrs.)

LUC-7100
April 2, 1986

U.S. Steel Corporation Chemical Division Neville Island Plant Pittsburgh, PA 15225

Attention: Mr. Ted Fusco

Plant Engineer

RE: Waste/Process Clarification U.S.S. Chemical Division Neville Township Allegheny County PAD #000824730

Dear Mr. Fusco:

Enclosed are two (2) copies of the inspection report from March 24, 1986 as discussed. Please sign these and return one copy to this office. The other copy is for your records.

Also enclosed is a current issue of the Rules and Regulations per your request.

If you have any questions, please call this office at 665-2900.

Sincerely,

Kathryn L. Watson

Solid Waste Specialist Bureau of Waste Management

KLW/kld

Enclosure: Inspection Reports

Regulations -

cc: Allegheny County File

Chron

K. Watson (2)

NEVILLE ISLAND PLANT

Division of United States Steel Corporation

PITTSBURGH, PENNSYLVANIA 15226 412/**XHXXXX** 778-3300

April 4, 1986

Ms. Kathryn L. Watson Commonwealth Of Pennsylvania Department of Environmental Resources Bureau of Waste Management Highland Building 121 South Highland Avenue Pittsburgh, Pennsylvania 15206-3988

RE: Waste/Process Clarification PAD #000824730

Dear Ms. Watson:

As requested enclosed is the signed inspection report from your March 24, 1986 visit.

Thank you for your quick response to our inquiry concerning the permitting requirements for neutralization of the acidic wastewater generated in the production of maleic anhydride. We will now proceed with the installation of the necessary equipment for the in-tank addition of caustic soda as we discussed during your visit and site inspection.

Sincerely,

Theodore M. Fusco

Supervisor -

Environmental Engineering

cdt

Enclosure

bcc: D. F. Vanfossen

G. R. Hanington

A. A. Spinola (Monroeville)

File GlOL-3

#### .HAZARDOUS WASTE INSPECTION REPORT Generators - Part A

Date	of inspection 3/24/86 Time start 7.00 Time finish 10:30
Name	of inspector Krithy Witson
Compa	my, installation name 155teel, Chemical Division
Locat	200 Noville Tokan Pottoburgh DA 15225
	y Alterheny Municipality Weville Island
	ification number_PADE 007.247.30
Name	of responsible official Tad FUSCO
Title	- Olant ergineer
	ng address Some
Area	code and phone no. (4.1) 778 - 3354
	of person interviewed Ted Fosco
Title	-2.W3
Maili	ng address (if different from above) 50mC
Area	code and phone no
	urrent waste handling method:
	On-site treatment storage, disposal
-	On-site
-	Off-site treatment, storage, / disposal
	mount of hazardous waste produced:
a	
b	
3. T	ypes of hazardous waste produced by Hazardous Waste Number:
4. A	re hazardous wastes transported off-site by the generator?   Yes   No

FEB 23 .94 12:48 FROM ARISTECH NEU ISLND

PAGE,005

900 398d . /7/\_ //.

## MAZARDOUS WASTE INSPECTION REPORT Part C - Comments

erson Interviewed (signature) Date
nvironmental Resources, Bureau of Solid Waste Management, inspected the above installation. he findings of this inspection are shown in this report. Any violations which were uncovered uring the inspection are indicated. Violations may also be discovered upon examination of he results of laboratory analyses and review of Department records. Notification will be orthoming, confirming any violations indicated herein and listing any additional violations.
his inspection report is official notification that a representative of the Department of
- maci the present regulations
No treatment permit for this process is required under the present regulations
the process and is not hazardous reposte treatment.
constitutes system can be considered a part of
after reviewing the process that the addition of
renders it was bozartos the Department has determined
Althorp the pt adjustment to the maleic acid
needed for the addition of coustic.
a treatment permit or permit-by-rule would be
facility questioned the Department is to whether
process must be shot down to clean the lines. The
solids from precipitating out of solution as the
souds from medicitating out of solution as the
the pH of the acid to a proximately pH 4. The sole
mossibility of olding constitute into the process to make
acid is not toced. The facility has been checking into the
- The fricinty has a process line tran which wrist makes
unty Alleghen, Municipality Meville Taland
mpany, Installation Name Distrel Chemical Division
te of Inspection March A, 1956 Identification Number 2170005,24730
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FEB 23 . 34 IS: 43 FROM BRISTECH NEU ISLND



# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

BUREAU OF WASTE MANAGEMENT
Highland Building
121 South Highland Avenue
Pittsburgh, Pennsylvania 15206-3988
(412) 645-7100 (answers 24 hrs.)

April 23, 1991

#### NOTICE OF VIOLATION

#### CERTIFIED MAIL #P-832 665 790

Mr. Stanley Kerkentzes Plant Manager Aristech Chemical Corporation Neville Island Plant 200 Neville Road Neville Island, PA 15225

> RE: April 16, 1991 Inspection Aristech Chemical Corporation Neville Island Plant Neville Township Allegheny County PAD000824730

Dear Mr. Kerkentzes

This Notice of Violation is to confirm the findings of the Department's referenced inspection of your hazardous waste generator activities. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.450 of the Rules and Regulations of the Department and the Pennsylvania Solid Waste Management Act (35 P.S. §6018). Violations of applicable sections of these regulations and the Act found during the inspection are as follows:

- 1. Eighteen hazardous waste manifests were noted either missing or with incorrect Pennsylvania hazardous waste transporter license numbers, in violation of 25 Pa. Code §75.262.20(g)(5).
- 2. Four hazardous waste manifests were noted either missing or with duplicate manifest document numbers, in violation of 25 Pa. Code §75.262.20(g)(1).



- 3. The hazardous waste n-butyl alcohol solution storage tank is not routinely inspected, in violation of 25 Pa. Code §75.262.34(a)(2) and 75.265.195.
  - 4. The hazardous waste n-butyl alcohol solution tank is not properly labeled for storage of hazardous waste in violation of 35 P.S. §6018.403(b)(2).
  - 5. Thirty-five drums of hazardous waste were noted on-site without proper labeling, in violation of 25 Pa. Code §75.262.34(a)(2) and 35 P.S. §6018.403(b)(2).
- 6. Twenty-three drums of hazardous waste were noted on-site in storage without benefit of marked accumulation dates, in violation of 25 Pa. Code §75.262.34(a)(4).
- 7. Twenty-three drums of hazardous waste were noted in storage which were marked inadequately as hazardous waste, in violation of 25 Pa. Code §75.262.34(a)(2).
- 8. Twenty-one drums of hazardous waste were noted either open or improperly/incompletely closed, in violation of 25 Pa. Code §75.262.34(a)(3) and §75.265.173(a).
- 9. At least nine hazardous waste storage locations were noted on-site which were not properly diked to contain hazardous waste spills and prevent run-on, in violation of 25 PA Code §75.262.34(a)(3) and §75.265.178.
- 10. One hazardous waste storage area was noted not to be constructed on an impervious base, in violation of 25 Pa. Code §75.262.34(a)(3) and 75.265.178.
- 11. One hazardous waste manifest was noted on file at this facility without a returned copy or a filed exception report, in violation of 25 Pa. Code §75.262.42.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Towards this end, please submit to the Department by May 30, 1991 a proposed abatement program and schedule for correcting these violations. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This Notice of Violation does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this Notice of Violation or the conditions upon which the Notice of Violation is based. This Notice of Violation shall not be construed so as to waive or impair any rights of the Department of Environmental Resources heretofore or hereafter existing.

This Notice of Violation shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this Notice of Violation, please feel free to contact me at my office.

Sincerely,

David K. Waldorf Solid Waste Specialist Bureau of Waste Management Southwestern Region

DKW:jc

cc: Central - Division of Compliance and Monitoring EPARegional File
Chron File

. DATE OF INITIAL EVALUATION THE BASIS FOR THIS REPORT:	AKICH IZ	Sa. AGE EVA	NCY RESPONSE	IBLE FOR	_	EPA State		Contractor/Stat
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	•	1	ed   Actu	1	!	COLLECTED	1	!

Burses of Wasta Management

## Hazardous Waste Inspection Report Comments — Part C

Page 30+ 4

County Alleylung	Identification Number	PADOU	0824732
Company, Installation Name	Verille Isla	1	
County Alleyleny	Municipality	v.1/2 1	y
			•
(1) One huxu-dour write news	Lest ( Not (	11962	(3) was noted
on tile without a retu	un copy	ora	Riled exception
report on file, in vivil	Air of 25	FA CO	rd 75, 262, 42
This montest was duted	4/9/90		
(11) All drens of hyturburs was	te reterred	Lo 12	this regist
are 55 gallon drims.			
12) One waste stream on site	" strip/	strip	alcohol" was
12) One waste stream on site noted to be bround on s	ite es f	iel is	an industrial
furnace Flush point as	nolysis rea	words.	from October
1948 indicate that this in	ateril flash	es at	148°F burely
over the DOUI threshold	This Facili	1, she	eld newdically
netest this metorial to	ensure His	X RA	A status is
not appropriate for this x	Grande Lun	less th	is Keility
notifies as @ such)			
(13) During this inspection 22 day	ins of cont	uminta	I water une
noted of untrum origins.	Ahazud	s was	te detainintin
should be personed on the	se ASAP		
14) Two of sadium	bich-wout	e wi-	noted on site
which were famely sel in	plant water	pre-	treatment It
disposed, these days wit	The parand	des we	.tes (0007)
-No TC, VIV	lutions N.	Hed-	
This inspection report is official notification that a report Resources, Bureau of Waste Management, inspecinspection are shown in this report. Any violation are indicated. Violations may also be discovered analyses and review of Department records. Notificated herein and listing any additional	ected the above ins ns which were und d upon examination lication will be forth	tallation. To covered du n of the re	The findings of this ring the inspection sults of laboratory
Person Interviewed (signature)	<u> </u>	Date	Musey
Inspector (signature)		Date .	4/ 16/4/

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#### Barnes of Wests Massesses

# Hazardous Waste Inspection Report Comments — Part C

Payl 4 of 4.

Date of Inspection 4/16/41	Identification Number PAD 000824730  Rilly Island  Municipality Marille Typ
Company, Installation Name Aristech - M	Mr. 1/2 Island
County #//e, Len	Municipality Marille Try
/ / LAND DISPOSAL RES	TRICTIONS COMMENTS
Alls willing noted	
	•
Resources, Bureau of Waste Management, inspirinspection are shown in this report. Any violations may also be discover	representative of the Department of Environmental pected the above installation. The findings of this ions which were uncovered during the inspection ed upon examination of the results of laboratory diffication will be forthcoming, confirming any violations.
Person Interviewed (signature)	it Date
Inspector (signature)	Date 4/16/9/

## Pounsylvenia Department of Environmental Resources Bureau of Waste Management

## Ha

Palace at Maria manahaman	
zardou <b>s W</b> aste Inspection Report Generator <b>s</b> — Part A	Çm

Date of inspection 4/6/41 Time start 8:10 AM Time finish 4:30 PM
Name of inspector Daniel Walder F
Company, installation name Aristech Chemicial Corp - New /e Isl Manti
Location 200 Nevilla Rd
County Alleghany Municipality Nesth Try
Identification number PAD 000824730
Name of responsible official Stanley Kerkentees
Title Plut Mgr.
Mailing address 200 New He Rd. New He Ishal PA 15225
Area code and telephone number (412) 788-3354
Name of person interviewed Steve Stockton / Gene Turuczy
Title Enut! + Sith, Mgr.   Enut! + Andrestow Kyline Tech.
Mailing address (if different from above)
Area code and telephone number
1 Current waste handling method:
1. Current waste handling method: a. □ On-site □ treatment. □ storage, □ disposal □ PBR
d. 🗆 Off-site 🗆 use, 🗎 reuse, 🗀 recycle, 🗀 reclaim
2. Amount of hazardous waste produced:
a. 30597 kg./mo. (4th Ot. 1440)
b kg./yr.
3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).
Waste Number Destination Facility Location and Type
1026/069/147/190 ENSCO Inc El Brack AK Inc
" Chemical Waste Mont Enelle AL Cdf1
Osol 1Fox 3 Chemton long Arm OH
Dool Chem Waste Mynt Revere New W. Carolton Oft Poll
Door Oldsver Corp Arvonia, VA
1001 Ross Tuesantin Worthon, OH
DOIS, Dudije/6 Fulija Cleun Harbors of Bristra Bristra 1814

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#### Possylvenia Department of Exvironmental Resources Surpose of Wasta Management

## Hazardous Waste Inspection Report Generators — Part B

Aristich - Ne. 1/1 Isla PADOUD 924730: 4/16/91

			1	ation Observed 2—Not Applicable 3—Not Determined 4—No	n-Compliance
	Stu	tus		REQUIREMENT	Chepter Citation
1	2	3	4		75.262
				Hazardous waste determination, copies available T.C. Rule	(b)
1				Identification number	(c)(1)
				Hazardous waste shipments offered only to licensed transporters	(c)(4)
				Authorization received from TSD facility for wastes shipped off-site	(d)
		!		PA manifest used for intrastate shipments	(e)(2)
				Disposer state manifest or EPA format manifest used for out-of-state shipments	(e)(3)
			(4)	Manifests filled out properly and completely	(2)(7)
1				Manifests routed properly and within time limits (7 days)	(e)(14) or (15
Ī		3		Proper U.S. DOT shipping containers or packages	(f)(1)(i)
		3		Shipping containers marked and labeled according to U.S. DOT	(f)(1)(ii)
		3		Containers of 110 gal. or less marked with required PA label	(f)(1)(iii)
!		3		Placards offered to transporter	(f)(2)
				Wastes accumulated on-site for less than 90 days	(g)(1)(i)
-			(4)	Wastes stored in proper containers and properly marked and labeled	(ii)(1)(ii)
-			(4)	Containers managed in accordance with 75.265(q)(1)—(9)	(g)(1)(iii)
			(9)	Containers clearly marked with accumulation date and visible for inspection	(g)(1)(iv)
1				Records retained at designated location for 20 years	(h)
•				Quarterly reports submitted to the Department	(i)
			9	Exception reporting procedures followed	(j)
	2			Hazardous waste disposal plan, if required	(1)
:				Spill reporting procedures followed	(m)(1)
				Preparedness, Prevention and Contingency Plan and Implemented	'm)(5)
	2			Special requirements followed for international shipments	(0)
1				On the job or classroom personnel training program [75.265(f)]	(g)(1)(6)
				Drum accumulation area inspected weekly as per 75.265(q)(5)	(g)(1)(iii)
-					
-					ı
	!				:

#### Ponnsylvania Copartment of Environmental Resources Bureau of Wasta Management

### Hazardous Waste Inspection Report Comments — Part C

Pye / of 4

Identification Number Company, Installation, Name Municipality In the "Requirement" Section of this inspection report, each listed inspection ftem may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations. Person interviewed (signature) Inspector (signature)

#### Foodorivant Department of Environmental Resources

## Hazardous Wasts Inspection Report Comments — Part C

Pyl Z st 4 ...

County — Hey Ley	Identification Number PADOUD 827733
Company, Installation Name Aristed	Municipality Nevilla Tryp.
County Alley Len	Municipality Nevilla Tage
	<b>,</b>
(5) Truty three duns of 1	ragados wiste in storge, and treline
downs of huturder	s unste in accomulation were enter in
site span without 1"	bleing as hurarbus muste in whiting
of 25 PA (orl 75.	762 34 (a) (2) and Section 403 (b)(2) of Act 67
	ru-los muste (some as above) were noted
in strage in/o here	Fit of me-Keel accountating dutes in
whiting of 25 /	14 Cool 75-262. \$34 (a)(4)
(7) Also, of the fhirt of	ems of paradis waste shoul at the
mutical homelling	building the that, three duns  Kel is hazadous waste wire not
which were am	Kel as hazadous waste were not
marked with approx	erate anoto codes, in colition of
27 AA (work 75.262.	34 (a)(2)
(8) Trelve dry of heza-d	as niste in stone, and nine dring
of hazarles werd	Le in accommentain were noted open
and/or improperty	and for incompletel closed in civilation
2 25 pl (ook 75)	. 262 , 34 (9/3) and 265, 173 (9),
(9) At least 9 location	it were ented here harmedes with
wis being street	without appropriate diking to
contain spills in	whin of 25 PA Cook 75.262. (4) (3)
and 269. 178. O.	ne of these greas we ented not to
have an imperiors	have as well a violation as cital.
Resources, Bureau of Waste Manager inspection are shown in this report. A are indicated. Violations may also be	ion that a representative of the Department of Environmental ment, inspected the above installation. The findings of this my violations which were uncovered during the inspection discovered upon examination of the results of laboratory ords. Notification will be forthcoming, confirming any violated additional violations.
Person Interviewed (signature)	North Date 4/11/81
Inspector (signature)	Date 4/15/91
	/ /



# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

BUREAU OF WASTE MANAGEMENT
Highland Building
121 South Highland Avenue
Pittsburgh, Pennsylvania 15206-3988
(412) 645-7100 (answers 24 hrs.)

November 21, 1989

NOTICE OF VIOLATION

#### CERTIFIED MAIL #P 979 043 337

Stanley Kerkentzes, Plant Manager Aristech Chemical Corporation Neville Island Plant 200 Neville Road Neville Island, Pennsylvania 15225

> RE: November 8, 1989 Inspection Aristech Chemical Corporation Neville Island Plant Neville Township Allegheny County PAD00824730

Dear Mr. Kerkentzes:

This Notice of Violation is to confirm the findings of the Department's referenced inspection of your hazardous waste generator activities. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.450 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during the inspection are as follows:

1. The hazardous waste rolloff box storage area is not on an impermeable diked base, in violation of 25 Pa. Code Section 75.262(g)(1)(iii) and 75.265(g)(10 and 11).

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Towards this end, you are to submit to the Department by December 15, 1989 a proposed abatement program and schedule for correcting these violations. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This Notice of Violation does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this Notice of Violation or the conditions upon which the Notice of Violation is based. This Notice of Violation shall not be construed so as to waive or impair any rights of the Department of Environmental Resources heretofore or hereafter existing.

Sincerely,

David Waldorf Bureau of Waste Management Southwestern Region

DW:jmt

cc: Central - Division of Compliance and Monitoring
EPA
Regional File
Chron File

feel free to contact me at my office.

## Ponnsylvanie Department of Environmental Resources of Waste Management

# GEN

## Hazardous Waste Inspection Report Generators — Part A

					JUAM Tir	ne finish $12$ ?	30 PM
	Name of inspecto	r _ <i>Q'a</i>	wid Wildo	<i>- f</i>			
	Company, installa	tion name	Aristech	Chemical 1	sep Ne.	ille Is. N	/unt
			10 Nerille				
	County	9-11eg	Lony	Munici	pality <u>Neville</u>	Top	
	Identification num	ber	AD000824	730			
	Name of responsi	ble officia	1 5 tanley	KerKentz	Les		
	Title	at M	Panager				
	Mailing address	Nes	ille Islama	1 PA 15	225		
			umber <u>(412) 7</u>				
	Name of person is	nterviewe	d Volin Koch	1 Steve.	Stockton		
	Title Enutl.	+ In	Arstrial High	ene Tech./ L	Enutl and	Safter My	·
			t from above)				
	Area code and tel	lephone n	umber	-same	_		
	1. Current waste	·		_			
		On-site	☐ treatment,	storage,	☐ disposal	□ PBR	
		On-site	use,	☐ reuse,	☐ recycle,	☐ reclaim	
		Off-site	☐ treatment,	$\square$ storage,	disposal		
	<b>d</b> . □ (	Off-site	use,	reuse,	☐ recycle,	☐ reclaim	
	2. Amount of ha	zardous v	vaste produced:			,	
	a	46	40	kg./r	no. (3rd q h	, 1989)	
	b			kg./y	ır.		
	3 Types of haza	irdoue wa	eta producad by Ha	zardous Waste Numl	ber and destination fa	acility (include loca	ition and type)
	Waste Number			nation Facility		Location and T	
1 1224/	U069/U147/U	C J E	NSCO Inc		El Dage	J. AR	<i>T</i>
"	5 17 17 17 17 13 13 13 13 13 13 13 13 13 13 13 13 13		hemical Wiste	M. +	Em ella	1	Incr.
	0001	(	WM Resolie	1	W. Carry	7	full blad
	FUU3 FO	01 (	hunton (so	7	Awn 0	· / · · · / · · · · · · · · · · · · · ·	, , , , , , , , , , , , , , , , , , ,
	Fusi	Fs	ntier Chemin	1 Wash Sus	Nincara	Fells NY	(, (,
	DUOZ	C	hem-Cleur		Cleveland	I OH	TRI
	1002	Ú	SX Cheminal	Sus of Oh	'~		١.
				,			

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ER-WM-300: Rev. 3/88

Hazardous Waste Inspection Report

Generators — Part B

Properties Aristech — Next 45...

Hazardous Waste Inspection Report

11/8/85

		1-8	• Viola	ties Observed 2—Net Applicable 3—Net Determined 4—Nos-	Compliance
Status			REQUIREMENT	Chapter Citation	
1	2	3	4		75.262
)				Hazardous waste determination, copies available	(b)
$\overline{1}$				Identification number	(c)(1)
1				Hazardous waste shipments offered only to licensed transporters	(c)(4)
Ì			Ī	Authorization received from TSD facility for wastes shipped off-site	(d)
		,		PA manifest used for intrastate shipments	(e)(2)
				Disposer state manifest or EPA format manifest used for out-of-state shipments	(e)(3)
(	į	į		Manifests filled out properly and completely	(e)(7)
	i			Manifests routed properly and within time limits (7 days)	(e)(14) or (15
	i	3		Proper U.S. DOT shipping containers or packages	(f)(1)(i)
İ		3	-	Shipping containers marked and labeled according to U.S. DOT	(f)(1)(ii)
		3		Containers of 110 gal. or less marked with required PA label	(f)(1)(iii)
		3		Placards offered to transporter	(f)(2)
-	i		İ	Wastes accumulated on-site for less than 90 days	(g)(1)(i)
1		į		Wastes stored in proper containers and properly marked and labeled	(g)(1)(ii)
}	į		(4)	Containers managed in accordance with 75.265(q)(1)—(24)	(g)(1)(iii)
	1			Containers clearly marked with accumulation date and visible for inspection	(g)(1)(iv)
į	ļ			Records retained at designated location for 20 years	(h)
1				Quarterly reports submitted to the Department	(i)
	1	ł		Exception reporting procedures followed	(j)
	2		í	Hazardous waste disposal plan, if required	(1)
<i>'</i>		İ		Spill reporting procedures followed	(m)(1)
				Preparedness, Prevention and Contingency Plan and implemented	(m)(5)
	2			Special requirements followed for international shipments	(0)
		1		On the job or classroom personnel training program [75.265(f)]	(g)(1)(6)
		(	4)	Drum accumulation area inspected weekly as per 75.265(q)(5)	(g)(1)(iii)
-					

## Hazardous Waste Inspection Report Comments — Part C

Date of Inspection	11/8/89	Identification Number	PADOUS	824730
		Chemical Corp	Neville I	-sland Plut
County Alla		Municipality N		
•	,		ĺ	
In the "Reduire	ement" Section of this	inspection report, eac	ch listed ins	spection item
		its corresponding oblid		
		ase use the Chapter cit		
inspection repo	rt as a reference too	btain a detailed descr	iption of com	oliance
requirements.				
1) The ha	znolos waste 1	oll-off box st	isrul are	is not on
an	imperminble of	Ked base in v	whitin a	+25 PA Cade
75.	262 G1 (1) (:) and	75.265 (a) (10+	11). Con	ntuinment
mea	ting these requi	remets is proper	nt for	55 gal drun
stor	ace of ligarid	hara-loss viste	however	
	<i>i</i>		,	
2) Weekly	inspection reco	rds for the	dren we	ste sturant
pud	were mission	ig En the the	ird g im	Le 1989, at
the	time of this	nds for the one inspection, in v	islation	of 25 MA lorle
79.2	67/91(1)(11) a	179.265(9)(5).	Mr. Kod	h advises
Hunt	he will locate	the missing	log shee	A and
Esta	and it to the	office.		
Resources, Buinspection are are indicated. analyses and r	ireau of Waste Managem shown in this report. Ai Violations may also be	ion that a representative of tent, inspected the above my violations which were discovered upon examina ords. Notification will be fo	installation. Thuncovered duri tion of the res	ne findings of this ing the inspection ults of laboratory
Person Interviewed (signa	sture) Dilka		Date	11/8/89
·	15/7		Date _	11/8/86
Inspector (signature)	11 6	- /		<del></del>

## Ponnsylvenic Department of Environmental Resources Baroos of Woste Monagement

# Hazardous Waste Inspection Report Comments — Part C

Date of Inspection	Identification Number 10141) 000 824730
Company, Installation Name Pristach Che	mil Corp Nevilla Island Mant  Municipality Neville T-p.
County Allegheny	Municipality Ner. 1/e T-p
	STRICTIONS COMMENTS
(1) All wastes from this to	wility are bunned from land
disposal * the only	5 sft - hummer waste generated at
this facility is U	sift - hommen waste general at
/	
(2) All waste streams within	the plant appear to disposed
a (womponed by approp	hard-bummer wastes are shipped
Certifications. All	hard-hummer wastes are shipped
centified as not me	eting LDR treatment standards
	U029 / UD69 / U190 continuented
	rich is shipped to Emelle AL.
The notificating form	n for this in aferial indicates thus
	t to a variance which
expires 6/8/91.	
*either as	Culitarnil List First-third, or
as lig	Culifornial List, First-third, or
	•
· · · · · · · · · · · · · · · · · · ·	a representative of the Department of Environmental
	spected the above installation. The findings of this ations which were uncovered during the inspection
are indicated. Violations may also be discove	ered upon examination of the results of laboratory
analyses and review of Department records. No tions indicated herein and listing any addition	otification will be forthcoming, confirming any viola- nal violations.
	1
Person Interviewed (signature)	Date Date
Inspector (signature)	Date _/1/8/89

## asylvania Department of Environmental Resources Bureau of Waste Management

Gen

## Hazardous Waste Inspection Report Generators — Part A

Date of inspection 81188 Time start 10.00	Am Time finish 3:00 PM					
Name of inspector Goodwald						
Company, installation name Aristech Chemical Corp						
Location Newille Island, Pittsburgh	·					
, · · · · · · · · · · · · · · · · · · ·	ry Neville Island					
$\lambda = 0$	ly Name +3884					
Identification number U PAD DOO 8 9 4 7 30						
Name of responsible official <u>Jim Bischoff</u>						
Title m GR of Production						
Mailing address <u>Same</u>						
Area code and telephone number $\frac{412}{778-3354}$						
Name of person interviewed John Kach / mike	Klobuka					
Title Environmental : Industrial Hygicia Tech/	. \ -					
, , ,						
Mailing address (if different from above) Same						
Area code and telephone number						
1. Current waste handling method:						
a. □ On-site □ treatment, □ storage,	☐ disposal ☐ PBR					
b. □ On-site □ use, □ reuse,	☐ recycle, ☐ reclaim					
c. ☒ Off-site □ treatment, □ storage,	🐧 disposal					
d. □ Off-site □ use, □ reuse,	□ recycle, □ reclaim					
2. Amount of hazardous waste produced:						
a. <u>ka.</u> /mo.						
b. 216 million 165/yr kg/yr.						
3. Types of hazardous waste produced by Hazardous Waste Number:  Ocera 15003 FOOI U147 U069 Doc4 U134 P048  Pool Doo9 15005 U008 U190 Oco7 P012  4. Are hazardous wastes transported off-site by the generator?   Yes M No						
DOO'S FOOS FOOL WILL DOO'S DOC'S VISU POUR 8						
DOO 1009 1005 U028 U190 OCC	7 POI'2					
4. Are hazardous wastes transported off-site by the generator? $\Box$	Yes 🕅 No 💮 🚓 😘					

## nasylvania Department of Environmental Resources Bureau of Maste Management

## Hazardous Waste Inspection Report Generators — Part B

Status		18	REQUIREMENT	Chapter Citation
1	2	3 4	<del></del>	75.262
X			Hazardous waste determination, copies available	(b)
X			Identification number	(c)(1)
(			Hazardous waste shipments offered only to licensed transporters	(c)(4)
(			Authorization received from TSD facility for wastes shipped off-site	(d)
X			PA manifest used for intrastate shipments	(e)(2)
			Disposer state manifest or EPA format manifest used for out-of-state shipments	(e)(3)
X			Manifests filled out properly and completely	(e)(7)
			Manifests routed properly and within time limits (7 days)	(e)(14) or (15
<b>\</b>			Proper U.S. DOT shipping containers or packages	(f)(1)(i)
X			Shipping containers marked and labeled according to U.S. DOT	(f)(1)(ii)
(			Containers of 110 gal. or less marked with required PA label	(f)(1)(iii)
(			Placards offered to transporter	(f)(2)
			Wastes accumulated on-site for less than 90 days	(g)(1)(i)
		()	Wastes stored in proper containers and properly marked and labeled	(g)(1)(ii)
		X	Containers managed in accordance with 75.265(q)(1)—(9)	(g)(1)(iii)
		Ø	Containers clearly marked with accumulation date and visible for inspection	(g)(1)(iv)
			Records retained at designated location for 20 years	(h)
			Quarterly reports submitted to the Department	(i)
	X		Exception reporting procedures followed	(j)
			Hazardous waste disposal plan, if required	(1)
(			Spill reporting procedures followed	(m)(1)
(			Preparedness, Prevention and Contingency Plan and implemented	(m)(5)
	X		Special requirements followed for international shipments	(o)
			On the job or classroom personnel training program [75.265(f)]	(g)(1)(6)
			Drum accumulation area inspected weekly as per 75.265(q)(5)	(g)(1)(iii)

# Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Waste Management

#### **Inspection Report Comments**

Date of Inspection 8/11/88 Identification Number PADOO0824730
Company/Facility/Site Name Aristach Chamical Carp.
Violations!
ber 75.2656)(1) - 1 drum containing hazardas unste labeled FOD3
uns severely buldged at both ends and setting one row
high on a pallet This drum should be overpacked or the contents
transferred to an undamaged drum
Sec 75.2656)(v), Act 97 Sec 403(2) - Roll-off Box containing
hazardous waste was not labeled as to accumulation date
or type of waste contained. This container should be
labeled with proper information.
Notes:
- Four drams of non-hazardous waste polyester resin, wanting to be
placed in a roll-off Box did not have secure lido This material
was setting close to a storm drain and could possibly enter the
drain in the event of a spill.
- Four badly rusted drums located on the side of the old firehouse
should be overpacked or the material noide should be transferred
to intact drumo.
- Under of por place should be sent by the time - the
- update of PPC Plan should be sent to my attention. John koch claimed he will send a copy to the nept.
Roch Gamed he will send a copy to the hept.
In the ''Requirement'' Section of this inspection report, each listed inspection item may provide only a brief version of

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were observed during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification may be forthcoming, confirming any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not neccessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)	marled	Date	
	y E. Goodwald	Date	8/11/89 Page 3 of 3

Aristech Chemical Corporation 600 Grant Street Pittsburgh, PA 15230-0250 412/433-2973

Jerome J. Pottmeyer, III
Counsel

**ARISTECHA** 

March 28, 1988



APR 1 1988

EPA, REGION III

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Haluszczak
Pennsylvania Department
of Environmental Resources
Bureau of Waste Management
Highland Building
121 South Highland Ave.
Pittsburgh, PA 15206-3988

RE: Financial Assurance

Aristech Chemical Corporation

Neville Island Plant

Dear Mr. Haluszczak:

Enclosed please find the following documents submitted by Aristech Chemical Corporation (Aristech) to demonstrate compliance with the financial assurance requirements at its Neville Island, Pennsylvania plant:

- Letter from Aristech's Chief Financial Officer (including statement required by Title 25, Pennsylvania Code §75.342(b));
- 2) A copy of the independent certified public accountant's report on examination of Aristech's financial statements for the latest completed fiscal year (as contained in Aristech's 1987 Annual Report);
- 3) A special report from Aristech's independent certified public accountant; and



Mr. John Haluszczak Page 2 March 28, 1988

4) A set of procedures that Aristech will make available to the public to process claims filed for personal injury and property damage to third parties.

A Collateral Bond for Hazardous Waste Facility, Collateral Bond Endorsement (Pre-Existing Liability), Irrevocable Standby Letter of Credit, and Amendment to the Irrevocable Standby Letter of Credit are already on file with the Department of Environmental Resources. The Amendment to the Irrevocable Standby Letter of Credit extended the date of expiration to March 27, 1989. However, no adjustment for inflation is being made to the estimated closure costs of \$32,935 at this time as a result of the process changes made at Neville Island eliminating the need for a hazardous waste permit and pending your request to Harrisburg regarding release of the collateral bond.

If you have any questions, please call me at (412) 433-2973.

Very truly yours,

Jerome J. Pottmeyer, III

JJP:kk Enclosures

cc: VRegional Administrator - w/encls.
U.S. Environmental Protection Agency
Region III
841 Chestnut Street
Philadelphia, PA 19107



### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

BUREAU OF WASTE MANAGEMENT Highland Building 121 South Highland Avenue Pittsburgh, Pennsylvania 15206-3988 (412) 645-7100 (answers 24 hrs.)

January 4, 1988

Aristech Chemical Corporation Neville Island Plant Pittsburch, PA 15225

Attention: Stanley J. Kerkentzes

Manager - Environmental Safety USX Tox- - 3-TA ICAL-AR

file

RE: Aristech Chemical Corporation

Neville Island

EPA I.D. No. PAD000824730 Totally Enclosed Treatment

Dear Mr. Kerkentzes:

On June 26, 1987, you indicated that the above referenced facility had installed the necessary equipment to conduct hazardous waste treatment in a totally enclosed treatment system as defined in Section 75.260 of the Rules and Regulations of the Department.

On December 16, 1987 the Department conducted an inspection of the facility and determined that the unit, that adjusts the pH of waste waters that were originally hazardous waste by characteristic of corrosivity, does meet the definition of Section 75.260(a). Therefore, the unit and the incinerator downstream from it no longer need to be covered by a hazardous waste permit under the provisions of Section 75.264(a)(3)(vi).

As a result of this determination and your September 24, 1987 request to withdraw your hazardous waste management permit application, we are also returning your Part B application for a hazardous waste incinerator.

If you have any further questions about this matter, please feel free to contact me at this office.

Sincerely,

Charles A. Duritsa

Regional Solid Waste Manager

CAD/JAH:bc

cc: Central Regional County Chron

RECTICAL SECTION



NOV 1 0 1986

Division of United States Steel Corporation

PITTSBURGH, PENNSYLVANIA 15230 EPA, R3

November 6, 1986

Mr. Charles Duritsa
Commonwealth of Pennsylvania
Department of Environmental Resources
Bureau of Solid Waste Management
Highland Building
121 Highland Avenue
Pittsburgh, Pennsylvania 15206-3988

Re: USX Corporation
USS Chemicals Division
Neville Island Plant
RCRA Permit
EPA I.D. No. PAD 000824730

Dear Mr. Duritsa:

Enclosed please find USS Chemicals' submission of the Part B Permit Application for its Neville Island Plant. (A certified check for \$3500 is also enclosed for the application fee.) This permit application is to cover the incineration of wastewater generated in the production of polyester resins.

This submission is intended to be a <u>protective</u> filing to assure that the Plant operates in a permitted status. We are making a protective filing because whether a RCRA permit is required for the incineration of wastewater generated in the production of polyester resins is unclear.

Thus, until the Ashland Chemical Company decision by Region IX, it seemed clear that the incineration of gaseous and water wastes from polyester resin production was exempted from permitting as a totally enclosed treatment facility. The availability of that exemption is no longer assured for similar operations, such as ours.

On the basis of current regulations and the actions of our polyester producing competitors with regard to RCRA permitting, we do not believe that a Part B permit is required when gaseous process emissions from polyester resin production are incinerated.



Mr. Charles Duritsa November 6, 1986 Page 2

In any event, USS Chemicals is in the process of studying appropriate modifications to its production facilities at the Neville Island Plant that may eliminate the need for a hazardous waste incinerator. In the event that USS Chemicals decides to modify its facilities, it will notify the Agency and initiate those actions necessary to withdraw the Part B Permit Application when it has completed its studies and testing.

Very truly yours,

Charles W. Hamilton

Senior Vice President

Chemicals & Specialty Products

JJP/jrh Enclosure PENNSYLVANIA DE 2

JUN 29 1987

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES EPA, R3

BUREAU OF WASTE MANAGEMENT

Highland Building

121 South Highland Avenue

Pittsburgh, Pennsylvania 15206-3988

(412) 645-7100 (answers 24 hrs.)

June 26, 1987

Aristech Chemical Corporation Neville Island Plant Pittsburgh, PA 15225

Attention: Ted Fusco, Manager

Environmental Safety

(FORMERLY USS CHEMICALS)

RE: Aristech Chemical Corporation

Neville Island Plant EPA I.D. #PAD000824730

Neville Island Allegheny County

Dear Mr. Fusco:

I am writing in regards to your April 16, 1987 letter and recent phone calls concerning the status of the permit application for the above referenced facility. Our discussions have centered on the need for a Part B Hazardous Waste Management Permit for the combustion process in view of the recent changes Aristech has implemented in the process. In our February meeting, you indicated that you wished to change the status of your facility from a TSD facility to only a generator by readjusting the processes so that the waste is no longer ignitable, nor corrosive (as a result of your totally enclosed treatment system) when it enters the incinerator.

The next step that Aristech should take would be to notify the Department that the totally enclosed treatment unit is in full operation with all of the necessary backup units. At this time you should submit a Notification of Hazardous Waste activity form which I have enclosed. Be sure that the cover letter you submit to the Department is specific and details how the facility is to go from a TSD facility to a generator only with a totally enclosed treatment unit. At that time you should also request the return of your hazardous waste Part B permit application.

At that time the Department anticipates conducting an inspection of the unit to insure that it complies with our regulations and guidance on totally enclosed treatment units and that the waste going into the incinerator is no longer hazardous.

Once the Department has confirmed that this is the case, Aristech can apply for a bond release under the requirements described in Section 75.325(a) of the Rules and Regulations of the Department and the requirement for insurance at that time would also be eliminated.

If you have any questions about this matter, please contact me.

Sincerely,

John A. Haluszczak Hazardous Waste Coordinator Burcau of Waste Management Southwest Region

JAH/1d

cc: Central County Chron EPA

Jerry Pottmeyer



# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

BUREAU OF WASTE MANAGEMENT
Highland Building
121 South Highland Avenue
Pittsburgh, Pennsylvania 15206-3988
(412) 665-2900 (answers 24 hrs.)

September 17, 1986

RECEIVED FA STITION

## CERTIFIED MAIL #P 041 011 884

U. S. Steel, Chemical Division Neville Island Plant Pittsburgh, PA 15225 SFP 19 1986

EPA, R3

Attention: Mr. Ted Fusco

Supervisor of Environmental Engineering

RE: Incinerator Status
USS Chemical Division
Neville Township
Allegheny County
PAD000824730

Dear Mr. Fusco:

Pursuant to the recent meeting between USS Chemical Division and the Department, the operating status of the hazardous waste incinerator at your Neville Island facility has been reviewed by the DER Central Office in Harrisburg.

In order to allow the continued operation of the hazardous waste incinerator without current interim status or permit, the Department requests that USS Chemical Division enter into a Consent Order & Agreement until the permit application has been reviewed and a permit granted.

A civil penalty will be assessed for the illegal operation of the hazardous waste incinerator, and will be a part of the Consent Order & Agreement.

If you have any questions, please call this office at 665-2900.

Sincerely,

X. Dhatson

Kathryn L. Watson Solid Waste Specialist Bureau of Waste Management

KLW/1d

cc: Regional File
Chron
Central
EPA - Carl Spadaro
Litigation - Ken Bowman
Charles Duritsa
Compliance Specialist
Nathy Watson (2)

Pat lingerden



**NEVILLE ISLAND PLANT** 

Division of United States Steel Corporation

PITTSBURGH, PENNSYLVANIA 15225 412/771-6200 August 20, 1986

USEPA Region III Hazardous Waste Management Division 841 Chestnut Street Philadelphia, PA 19107

Gentlemen:

Enclosed is USS Chemicals Neville Island Plant's biennial waste minimization activity report for the 1984-1985 reporting period.

The lateness of this submittal is our oversight. We had assumed that the State of Pennsylvania regulated all the facets of the RCRA programs. Since Pennsylvania specifies quarterly reporting of our hazardous waste activities and does not require a biennial report, we missed the EPA waste minimization notification requirement.

Should you have any question concerning the attached report please contact me or Ted Fusco, Supervisor of Environmental Engineering (412) 778-3354.

Sincerely,

E.R. Fluharty Plant Manager

SPTenhart

ERF/d1m

cc: PA DER



AUG 25 1986

Waste Management Branch EPA - Region IH

#### NOTIFICATION OF WASTE MINIMIZATION ACTIVITY - 1985

Name of Installation:

USS Chemicals

Installation Address:

200 Neville Road, Pittsburgh, PA 15225

EPA ID No.:

PAD 000 824 730

Ownership:

USX Corporation, 600 Grant Street, Pittsburgh,

PA 15230

Installation Contact:

Eugene R. Fluharty, Plant Manager

#### SECTION A: HAZARDOUS WASTE GENERATED:

YEAR	VOLUME (POUNDS X 10 <sup>3</sup> )
1983 1984	21,625 14,148 *
1985	13,893

<sup>\*</sup> Does not include 2,121,000 lbs. of waste generated from a one time clean—out activity in closing the vessels associated with the shutdown of the phthalic anhydride production facility.

### SECTION B: SUMMARY OF THE WASTE MINIMIZATION ACTIVITY

Improvements in operating procedures in both the maleic anhydride and polyester resin plants have been instrumental in reducing the waste volume generated. Developmental work undertaken in 1985 has shown that change in the manufacturing process will render our high volume waste stream non-hazardous. With the addition of this processing step, an 80 percent reduction in hazardous waste generation is forecasted for this facility. Limiting the volume of off-grade material generated through tighter process controls will continue to be an operating goal.

Authorized Representative,

E.R. Fluharty Plant Manager

Division of Solid Waste pproved. OMB No. 2050-0028. Expires 9-30-88. GSA No. 0246-EPA-OT Please print or type with ELITE type (12 characters per inch) in the unshaded areas pny o 5 1086 United States Environmental Profession Agency Washington, DC 20460 Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation) Notification of Hazardous Waste Activity and Recovery Act). For Official Use Only Comments C С **Date Received** dayl Approved IVI. Installation's EPA ID Number mo. F Name of Installation C S E M 1 S Н II. Installation Mailing Address Street or P.O. Box D P N E Ε N City or Town State ZIP Code 2 2 | 5 P R U Location of Installation Street or Route Number M City or Town State ZIP Code IV. Installation Contact Name and Title (last, first, and job title) Phone Number (area code and number) Ε N Н R Y U L U Ownership A. Name of Installation's Legal Owner B. Type of Ownership (enter code) S C R R Т Ι 0 N U X VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.) A. Hazardous Waste Activity **B. Used Oil Fuel Activities** ☑ 1a. Generator ☐ 1b. Less than 1,000 kg/mo. 6. Off-Specification Used Oil Fuel (enter 'X' and mark appropriate Processes of the CENCE) 2. Transporter □ a. Generator Marketing to BPAerSECTION 3. Treeter/Storer/Disposer 4. Underground Injection ☐ b. Other Marketer 5. Market or Burn Hazardous Waste Fuel OCT 8 (enter 'X' and mark appropriate boxes below) a. Generator Marketing to Burner 7. Specification Used Oil Fuel Marketer (or On site Burner) Who First Claims the Oil Meets the Specification EPA, R3 ☐ b. Other Marketer VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriete boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.) B. Industrial Boiler C. Industrial Furnace A. Utility Boiler VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es) A. Air B. Rail C. Highway D. Water ☐ E. Other (specify) IX. First or Subsequent Notification Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below. C. Installation's EPA ID Number ☐ A. First Notification B. Subsequent Notification (complete item C) 0 8

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and a continue addition is obsolete

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F 0 0 1 F 0 0 3		
-	1 10 11	12
B. Hazardous Wastes from Specific Sources. Enter the four-digit nur specific sources your installation handles. Use additional sheets if	nber from 40 <i>CFR</i> Part 261.32 for each liste necessary.	d hazardous waste from
13 14 15	16 17	18
19 20 21	22 23	. 24
25 26 27	28 29	30
C. Commercial Chemical Product Hazardous Wastes. Enter the four- your installation handles which may be a hazardous-waste. Use add	digit number from 40 CFR Part 261.33 for e itional sheets if necessary.	each chemical substance
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D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR pitals, or medical and research laboratories your installation handle		hospitals, veterinary hos-
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E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boyour installation handles. (See 40 CFR Parts 261.21 — 261.24)  I. Ignitable   2. Corrosive	exes corresponding to the characteristics of a	nonlisted hazardous wastes
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RECEIVED PA SECTION OCT 8 1986

EPA, R3

SWM 69:1/82	PENNSYLVANIA DEPARTMENT OF SOLID WA		URCES	RECEIVED Division of Solid Woote
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Eugene R. Fluharty,			- 4	1 2 7 7 8 3 3 0 3
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#### XIII. **DESCRIPTION OF HAZARDOUS WASTES**

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- HAZARDOUS WASTE NUMBER Enter the four-digit number from 75.261(h) for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 75.261(h), enter the four-digit number(s) from 75.261(g) that describes the characteristics and/or the EP toxic contaminants of those hazardous westes.
- ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will handled on an annual basis. For each characteristic or EP toxic conteminant entered in column A estimate the total annual quantity of all the non-listed weste(s) that will be handled which possess that characteristic or contaminant.
- URIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

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If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the wasts.

#### D. PROCESSES

- 1. PROCESS CODES:
  - For listed hazardous waste: For each listed hazardous waste entered in column A select the code/s/ from the list of process codes contained in Section XII to indicate how the waste will be stored, treated, and/or disposed of at the facility. For non-listed hazardous wastes: For each characteristic or EP toxic contaminant entered in column A, select the code/s/ from the list of process codes contained in Section XII to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous westes that possess the characteristic or toxic contaminant. Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above: (2) Enter "000" in the extreme right box of Item XIII-D(1); and (3) Enter in the space provided on page 5, the line number and the additional code(s).
  - PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one Hezardous Waste Number shall be described on the form as follows:

- Select one of the Hazardous Waste Numbers and enter it in column A. On the same line complete columns B. C. and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste. In column A of the next line enter the other Hazardous Waste Number that can be used to describe the waste, in column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other Hezardous Waste Number that can be used to describe the hazardous weste.

EXAMPLE FOR COMPLETING SECTION XIII (Shown in tine numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of leaded tank bottoms from the petroleum refining industry. In addition, the facility will treet and dispose of three non-listed westes. Two westes are corrosive only and there will be an estimated 200 pounds per year of each weste. The other weste is corrosive and ignitable and there will be an estimated 100 pounds per year of that weste. Treetment will be in an incinerator and dispose will be in a landfill.

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LINE NO.	I W	ast	E.N cod	0.	QUANTITY OF WASTE	SURE (enter code)		, ;	. PR		ESS C nter)	ODES	l			2. PROCESS DESCRIPTION (if a mode is not entered in D(1))
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X-3	D	0	o	1	100	P	T	0 3	D	8	0					
X;4	O	0	0	2												"included with above"

NOTE: Photocopy this page before completing If you have more than 26 wastes to list.

		•			this page before completing in	STE	S fee	mt											· Salgebook
70 3	w	A Tax Ste	ird N	٥.	B. ESTIMATED ANNUAL QUANTITY OF WASTE	Signal Signal	UNIT ME URE nter							ES	s co	ODE	s		D. PROCESSES  2. PROCESS DESCRIPTION if a code is not entered in D(1)
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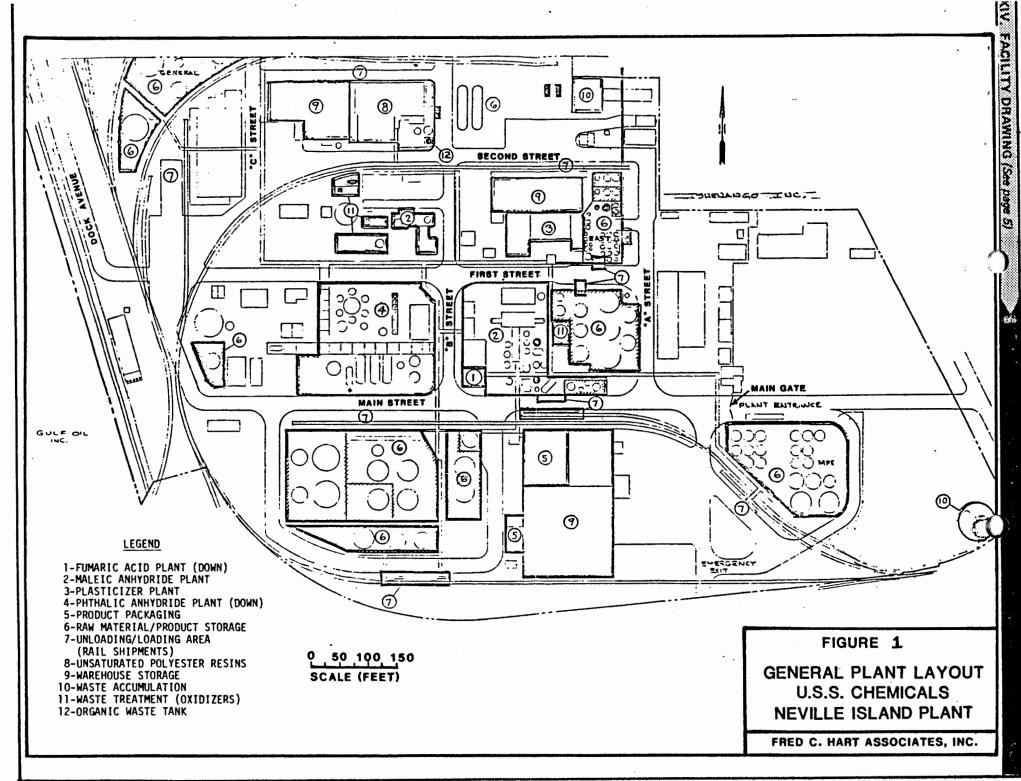
III. DESCRIPTION OF HAZARDOUS WAS TO	continued)	<b>&gt;</b>			•
USE THIS SPACE TO LIST ADDITIONAL PROCESS (	codes from Ite	A 0(1) ON PAGE 4.			
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IV. FACILITY DRAWING					
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V. PHOTOGRAPHS*  Il existing facilities must include ophotographs (serie) or gr	ound-level) that cle	uty datineste ell existina	structures: existing sto-	rans trastment and	disposal
eas; and sites of future storage, treatment, or disposal area					
VI. FACILITY GEOGRAPHIC LOCATION  LATITUDE (degrees, minutes, & second	≥á , ·	•	NGITUDE (degrees, mi		
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VII. FACILITY OWNER		A			
A. If the facility owner is also the facility operator as	s listed in Section V	ll, place an "X" in the b	ox to the left end skip t	a Section XVIII belo	w.
B. If the facility owner is not the facility operator as					
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3. STREET OR P.O. BOX		L CITY OR TOWN	5, 57	6. ZIP COD	<u> </u>
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VIII. OWNER CERTIFICATION	ķ .	in an ann an an an an an an an an an an a			·
certify under penalty of law that I have personally scuments, and that based on my inquiry of those in bmitted information is true, accurate, and complet cluding the possibility of fine and imprisonment.	ndividuals immedi	ately responsible for a	obtaining the inform	ation, I believe tha	t the
NAME (print or type) Charles W. Hamilton	B. SIGNATURE		/   C.I	ATE SIGNED	
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Specialty Products	Mulles	- 1 danne		0/23/86	
X. OPERATOR CERTIFICATION	ere	7	700000 1 DOCUMENT OF THE PARTY		· January Company
certify under penalty of law that I have perso <u>nally</u> occuments, and that based on my inquiry of those in bmitted information is true, accurate, and complete cluding the possibility of fine and imprisonment.	e. I am aware tha	ately responsible for a there are significant	ornauon submitted i obtaining the inform penalties for submit	n ਯਾਤ ਭਸਰ all attac ation, i believe tha ting false informat	nea t the ion,

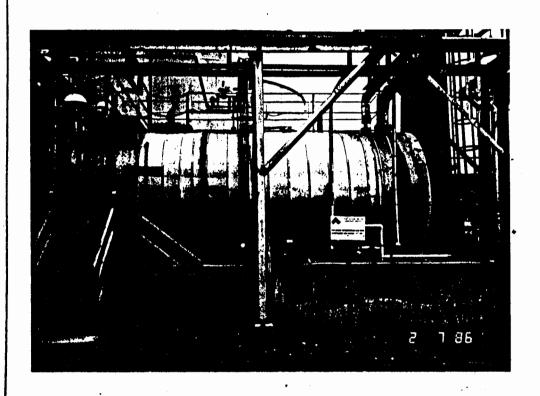
Eugene R. Fluharty

A. NAME (print or type)

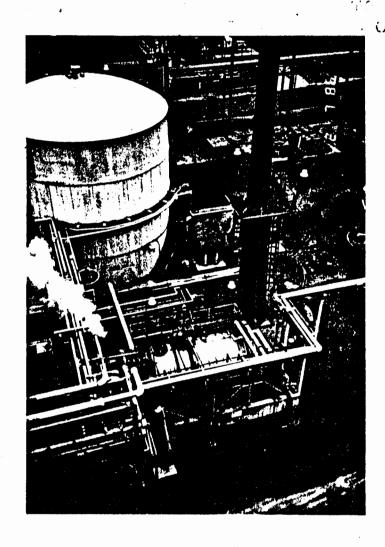
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C. DATE SIGNED
8/22/86

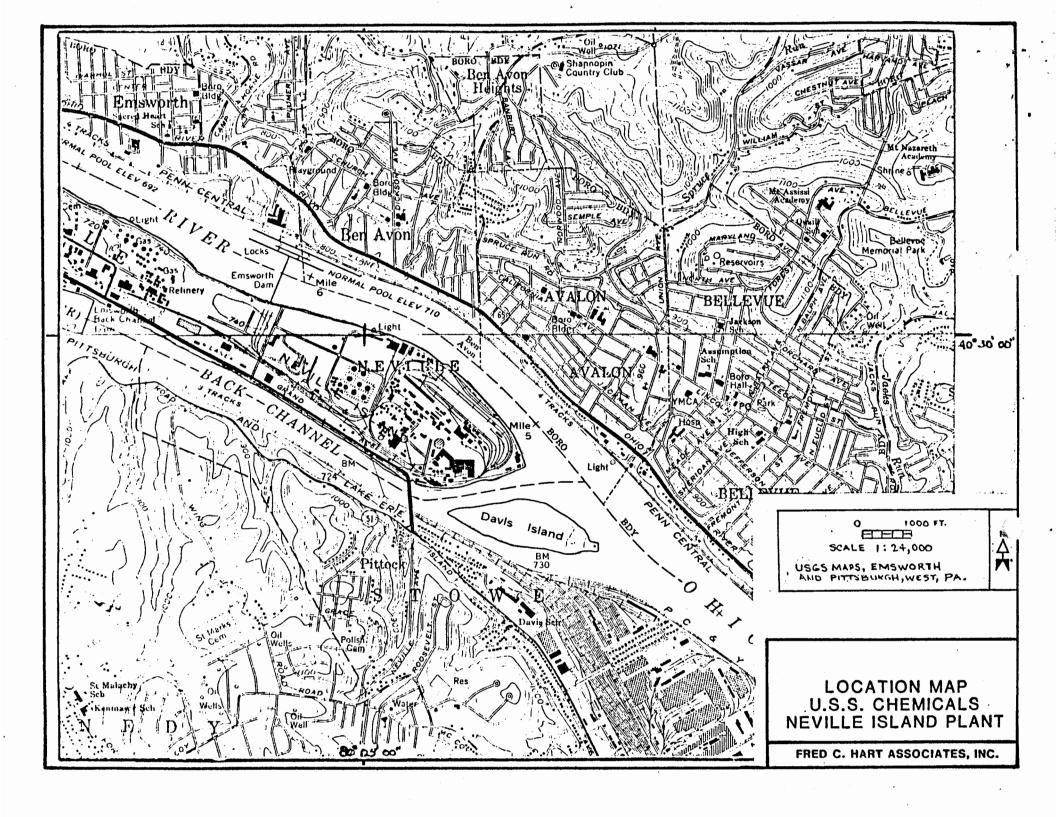




AQUEOUS WASTE STORAGE TANK



STORAGE TANK-INCINERATOR SYSTEM.



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EPA Form 8700-12 (Rev. 11-85) Reverse

ID — For Official Use Only







NOV 17 1986

EPA, R3

United States Environmental Protection Agency Region III Waste Management Branch MS3HW34 841 Chestnut Street Philadelphia, Pennsylvania 19107

November 13, 1986

Re: RCRA Permit Transfer

EPA I.D. No. PAD000824730

Neville Island Plant

Dear Sir or Madam:

This letter is a request for the transfer of the above-referenced permit to a new corporate entity.

Aristech Chemical Corporation (Aristech) is a company newly formed by USX Corporation (USX). In approximately three to four weeks, USX plans to transfer to Aristech substantially all of the assets of its USS Chemicals Division, including the Neville Island Plant. Those permits that are transferrable will also be transferred to Aristech. USX will then sell its shares in Aristech to the investing public. After this transaction, USX will have no ownership interest in Aristech.

Accordingly, USX will be transferring the subject RCRA permit to Aristech Chemical Corporation. For your use, we have enclosed a signed original of the modified Part A permit for the Neville Island Plant.

Very truly yours,

Jerome J. Rottmeyer, 111

Attorney

JJP/jrh Enclosure

cc/we: Mr. Charles Duritsa (signed copy)

Pennsylvania Department of Environmental Resources

121 South Highland Avenue

Pittsburgh, Pennsylvania 15206

ER-SWM 59:1/82

#### PENNS ANIA DEPARTMENT OF ENVIRONMENTAL BUREAU OF SOLID WASTE MANAGEMENT

DURCES

HAZA JOUS WASTE PERMIT APPLICATION - . AT .

Please print or type in the unshaded areas only	•
EPA I.D. NUMBER	
.PA D 0 0 0 8 2 4 7 3 0	
II. NAME OF FACILITY	
Aristech Chemical CorpNeville Island Pl	ant
III, FACILITY CONTACT	And the second second
A. NAME & TITLE (last, first, & title)	8. PHONE (area code & no.)
Eugene R. Fluharty, Plant Manager	4 1 2 7 7 8 3 3 0 3
IV. FACILITY MAILING ADDRESS	
Neville Island Plant	
8. CITY OR TOWN	C. State D. Zip Code
Pittsburgh	PA 1 5 2 2 5
V. FACILITY LOCATION  A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIF	SER MUNICIPALITY
•	•
Neville Island Plant	Neville Township  C. State D. 25 Code F. COUNTY
Pittsburgh	PA 1 5 2 2 5 Allegheny
VI. SIC CODES (4-digit, in order of priority)	in a great and a g
A PIRST	CTHIRD
2 8 6 9 Plasticizers 2	8 6 5 Maleic Anhydride
B. SECOND	D. FOURTH
2 8 2 1 heading Polyester Resins	(apacity)
VII. OPERATOR INFORMATION	
A NAME	B. is the name listed in  Item VII -A step the
to to the control of	owner?
Aristech Chemical Corporation	O. BOX
	<u>V. 200.</u>
600 Grant Street D. CITY OR TOWN	E. State F. Zip Code G. PHONE (gree code & np.)
	PA 15219 412 433 1121
Pittsburgh .	1 7 A 1 A 2 4 1 2 A 1 4 1 2 1 1 1 2 1 1 1 2 1 1 1 2 1 1 1 2 1 1 1 2 1 1 1 2 1 1 1 2 1 1 1 2 1 1 1 2 1 1 1 2 1 1 1 2 1 1 1 2 1 1 1 2 1 1 1 2 1 1 1 2 1 1 1 2 1 1 1 2 1 1 1 2 1 1 1 2 1 1 1 1 2 1 1 1 1 2 1 1 1 1 2 1
H. STATUS OF OPERATOR (Enter the appropriate letter into the en	
VIII. EXISTING ENVIRONMENTAL PROGRAM PERMITS	
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s. UIC (Underground Injection of Fluids) E. SOLIO WASTE	
C. RCRA (Hezardous Wastes) F. OTHER	(specify)
IX. MAP	
4 to this application a topographic map of the area extending to at	east one mile beyond property boundaries. The map must show the

c. I of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and any well where it injects fluids underground, include all springs, rivers and other surface water bodies in the map area as per the instructions.

X. NATUR	RE OF BUSINESS (provide	lef (* ription)	1, 1	3.7 3.		-	21の機能
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revised appl	in the appropriate box in A or B icetion. If this is your first application in Section I.	below <i>imerk one box on</i> ation and you aiready kn	iyi to indica: low your faci	s whether t lity's EPA I	his Is the first application you an .D. Number, or if this is a revised	submitting for your application, enter y	facility or our facility's
- FIRST AF	FLICATION (place an "X" below	e and provide the approp	riste date)		☐ 2. NEW PACI	ATY (Complete item	
719		G PACILITIES, PROVID IEGAN OR THE DATE O				POR NEW FA. PROVIDE THE TION BEGAN	B DATE ) OPERA- OR IS EX-
	APPLICATION (place on "X" be	elow and complete Section	a I)		2. FACILITY	LEPECTED TO B	Tristalia (
	ESSES - CODES AND DES						
entering co	CODE — Enter the code from the codes. If more lines are needed, and process fineleding its design of	iter the code(s) in the spe	ce provided.	If a process	will be used that is not included	lity. Ten lines are pr in the list of codes t	ovided for selow, then
i. Amou	DESIGN CAPACITY — For each INT — Enter the amount. OF MEASURE — For each amou					sk that describes the	unit of
Rheasur	e used. Only the units of measure TRO- CTER	APPROPRIATE UNITE MEASURE FOR PROC	ey be used. : OF		PRO- CESS	APPROPRIATE U MEASURE FOR P	NITS OF
TORAGE:	PROCESS CODE  704, drum, stc.) 801 802	DESIGN CAPACITY  Gallons or Liters Gallons or Liters	T	PROC ERATMEN DE	ess code	Gallons Per Day or	Ŷ
iaste Pile uriace impor OSAL:	\$03	Oubic Yards or Cubic M Gallons or Liters		uface Impo cineratos	undment : TO2 TOS	Liters Per Day Gallons Per Day or Liters Per Day Tuns Per Hour or h	letric Tone
tion Well	<b>978</b>	Gallons or Liters Acre-Fest (the volume to spould cover one care to	their Q	itum (Uno fo	r physical, chemical,	Per Hour: Gallons I Liters Per Hour Gallons Per Day or	er Hour or
and Applicat Scena Dispose	tion [78] il [762]	depth of one foot) or Hectare-Meter Acres or Hectares Gallons Per Day or Liters Per Day	外鄉	oc <i>eses not</i> rface impot pre. Describ	occurring in tanks, indments, or inciner- s the processes in	Liters Per Day	
urface Impor	undment D83 UNIT O MEASU	Galions or Liters F		UNIT OF		unet of Measure	
DMIT OF ME Selions Sters	LASURE CODE	UNIT OF MI Liters Per Da Tons Per Hou Metric Tons		CODE	UNIT OF MEASURE Agre-Foot Risotare-Motar	CODE	
Jubic Yards Jubic Maters Salions Per D	Ly:::::::::: 🖁	Liters Per Bo	HANT	:: <b>X</b>	Acres		
EXAMPLE	FOR COMPLETING ITSM	V: Vii Wanne te tine en	share X-1 a	a x.2 ka	ow/: A facility has two stores		ng sampe in
OC pellone	and the other can hold 400 g	elions. The facility also	has an inc	nerator th	nt can burn up to 20 gellons	e tents, one tent	an roid
A PRO- CESS CODE	B. PROCKES DESIGN CA	70	R FICIAL	A. PRO-	2. Process design	CAPACITY 2. UNIT	POR OFFICIAL
(from lat ebose)	1. AMOUNT (specify)	OF NRAL US		CODE ffrom list share)	1. AMOUNT	OF MEA- SURR (enter code)	USE
-1 5 0 2	800	6	Б				
2 7 0 3	20	ε	6		·		
т 0 3	300	E	7				
2 05	15,000	G	8				
3			9				+++
•			10				

(continued)	

XII

A CONTRACTOR OF THE PROPERTY O			TH CYLYCILL	INCFADE DESIG
FOR EACH PROCESS ENTERED HER	THER PROCESSES (code "TO4").	ON EON DESCHIBING O.	DILIONAL PROCESS CODES	SPACE FOR AD

	989	EDT 9	006 ·	X 0 8 2	I-X
M. s note in not sureled in D(1)) F ESOCESP DESCRIELLON	. PROCESS CODES (mider)	D1 NEV-	PATRICT OF WAITE	(open atus)	NE SE
ROCE SEE	<b>8 8</b>	ि व्यव्य			
in column A, select the code(s) from the first fore, tries from the code body. The mon-listed store, tries first three as described above: [2] Enter a page 5, the line member and the additional tries and the additional tries apace provided on the better the process in the apace provided on the complete columns B, C, and O by estimating complete columns B, C, and O by estimating at, store, and/or dispose of the weste.	to the house of the house of the to the to be seed to be seed to the tot be seed with the the tot be seed with the the tot be seed with the the tot be seed with the the tot be seed to the the the tot be seed to the the tot be seed to the tot be tot be seed to the tot be tot	to will be stored, its of cheest-strict or its characteristic or its of the control of the contr	instandous wester: For each listed to the was codes contained in Section XI and because the characters from the wester that posses the characters from the characters from the contained to the contained to the contained to the contained to the contained that the code is not the foreight of the white box of the code is not the foreight of the white the code is not the code in t	HE SECTION  FOR THE SECTION  THE HAZARDOL  THE HAZARDOL  THE HAZARDOL  THE HAZARDOL  THE HAZARDOL  THE THE TOTAL  THE TOT	X 9 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
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	* * * * SNOT DIMITEM	1	SN SGNA	IOT.	
SCOO SPILE	AEM TO TINU DIFFE	3G00	GLISH UNIT OF MEASURE	ENI	
assendous waste you will handle. If you handle ordow characteristics and/or that there is the said his part that will handled on the total amount quentity of that wents to the total amount quentity to the total amount of the t	SC-Sf most lakedomin sigle-two sits estimate A mounts of beret t esembles A mounts of benetite or committee to	of filt, ware the filt to the second of the	tes whitels are not listed in 35, conseniors and those heaendor AMMAL GLAMITITY — For each characteristic of EP (1) for sect cases while the hendled which possess that the hendled which possess that the particular is a property of the particular in the particular	team suchtstanf o pixos 93 eft A OSTAMITAS sleed leunne ne v tadt lajateme	р и .>
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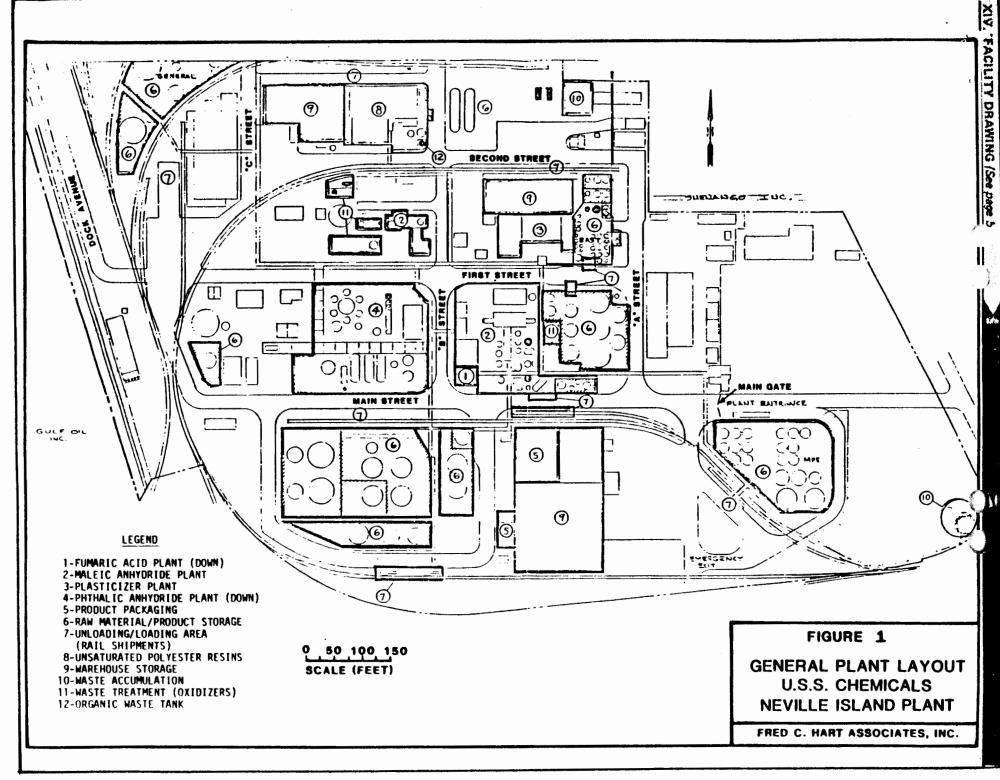
080 E01

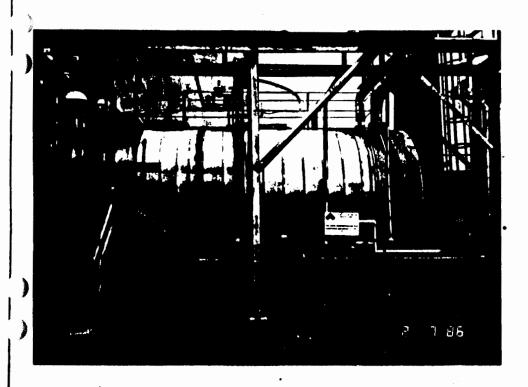
989 601

"snotuded with above"

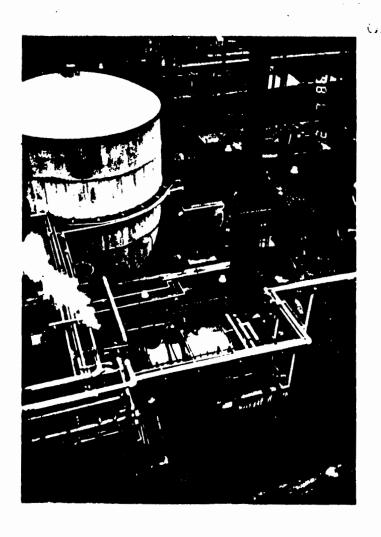
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<u>,</u>		Final Rose			B. ESTIMATED ANNUAL QUANTITY OF WASTE	ŏ	UNIT MEA URE	ŀ		345		1 1	PR:	oce	38.0	:OD	TA.		D. PROCESSES
	fer.	1	e4 T	de)		1	ode)	1		7	7	ļ	T	(en	er)		$\bar{\Box}$	T	2. PEOCESE DESCRIPTION  ### 6 code is not entered in D(1))
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2	b	0	b	2			Ш		1		1	1			L		Ц		are ignitable and/or corrosive.
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26	T	Γ		П				T	1	T	T	T	T	T		П		T	

XIII. DESCRIPTION OF HAZARDOUS UST	continued		
E. USE THIS SPACE TO LIST ADDITIONAL PROCESS	CODES FROM ITEM D(1) DN PAGE 4.		
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and the said			
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XIV. FACILITY DRAWING			
All existing facilities must include in the space provided on	page 6 a scale drawing of the facility face	instructions for more	detail),
XV. PHOTOGRAPHS		•	<u> </u>
All existing feelilities must include photographs (seriel or granes; and sites of future erorage, treatment, or disposal are		ing structures; existing	storage, treetment, and disposat
XVI. FACILITY GEOGRAPHIC LOCATION	<b>&gt;</b> 4		
LATITUDE (degrees, minutes, & secon	<b>6)</b> (6) (1) (1)	LONGITUDE (depres	, minutes, & seconds)
403000	,	8 0 0 9	000
XVII. FACILITY OWNER			
		rel heady y ly de <b>ilite</b> amsteil	
A. If the facility owner is also she facility operator a	es illeted in Section VII, place an "X" in th	a box to the left and s	kip to Section XVIII below.
8. If the fability owner is not the facility operator a	e lieted in Section VII, complete the follow	utng ituma:	•
1. NAME OF FACT	LITY'S LEGAL OWNER		2. PHONE NO. (eren code à na.)
2. STREET OR P.O. BOX	A. CITY OR TOWN		ST. 4. ZIP CODE
	1		
XVIII. OWNER CERTIFICATION			
I certify under penalty of lew that I have personally			
documents, and that based on my inquiry of those is aubmitted information is true, accurate, and comple			
including the possibility of fine and imprisonment.	<b>E</b>		
A. NAME (print or type) Charles W. Hamilton	B. EGNATURE	n/	C. DATE BIGNED
Senior V.PChemicals & Specialty Products	The Sun Whan	neth	n/13/86
XIX. OPERATOR CERTIFICATION	W-XIYO-YOI IYON		
I certify under penalty of law that I have personally	examined and are families with the	information submit	ted in this and all attached
"uments, and that based on my inquiry of those is	individuals immediately responsible f	or obtaining the Inf	ormation, I believe that the
sitted information is true, accurate, and comple woulding the possibility of fine and imprisonment.	te. I am aware that there are significa	mt penalties for sub	mitting false information,
A. NAME (print or type)	B. SIGNATURE.	-	C. DATE SIGNED
•			<del>-</del> i





AQUEOUS WASTE STORAGE TANK



STORAGE TANK-INCINERATOR SYSTEM



